standard BellSouth proprietary solutions that hold no practical value for CLECs that will provide service in multiple ILEC serving areas or have chosen to implement industry standard interfaces. Moreover, Sprint's experience continues to demonstrate that BellSouth's OSS for unbundled network elements require the use of a combination of interfaces which rely upon both manual and electronic interaction. This cumbersome operating environment clearly does not provide CLECs with a meaningful opportunity to compete.

85. BellSouth's performance data submitted in this proceeding confirms that it is not meeting its parity and nondiscrimination obligations in multiple areas. Notwithstanding BellSouth's performance deficiencies, its proposal to measure and report its results is insufficient in that the data is insufficiently disaggregated, there is no provision for the use of statistical models to evaluate parity and there are no standards to which measures without retail analogs can be compared. Moreover, the data provided does not provide complete information for the three months submitted and does not provide any data on several measures. Until these deficiencies are corrected, this Commission can't even begin to make a fact-based assessment of BellSouth's ability to meet its obligations under the Act.

86. Finally, little improvement can be noted in BellSouth's support of unbundled network elements provided to Sprint since BellSouth's last application to the Commission for interLATA authority in Louisiana. Sadly, Sprint's experience continues to demonstrate that BellSouth's systems and processes supporting unbundled network elements are unable to provide consistently acceptable

performance. These failed processes and systems continue to result in missed customer due dates, inappropriate service interruptions, increased order processing time and extended service outages. Aside from the excessive operating costs, lost customers and lost revenues that have resulted, Sprint continues to suffer damage to its reputation and brand name that will be difficult, if not impossible, to overcome in a competitive environment. These experiences reflect BellSouth's continued failure to provide nondiscriminatory access to network elements and its failure to provide CLECs with a meaningful opportunity to compete.
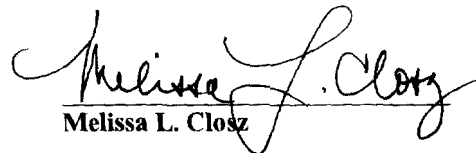
STATE OF FLORIDA

COUNTY OF

VERIFICATION

I, Melissa L. Closz, first being duly sworn, state on my oath that I am

Director – Local Market Development for Sprint Communications Company L.P.

("Sprint). I am authorized to act on behalf of Sprint regarding the foregoing

statement. I have read the aforesaid statement and I am informed and believe that

the matters contained therein are true and correct to the best of my knowledge.

Dated: July 31, 1998.

_____
Melissa L. Closz

Melissa L. Closz appeared, and being first duly sworn upon her oath stated

That she is Director – Local Market Development, that she signed the foregoing

document in that capacity and the facts contained therein are true and correct

according to the best of her knowledge.

IN WITNESS THEREOF, I have set my hand and affixed my official seal

In the aforesaid county and state on the above date.

_____
Notary Public

My commission expires: 5| 2 6 | 200 /

EXHIBIT MLC - 1

BellSouth FOC Problems
January 1998

FOC Problems (Over 48 Hours)

(FOC = Firm Order Confirmation)

(ASR = Access Service Request)

(PON = Purchase Order Number)

Number ASR's Submitted to have an FOC in the Current Month: 33

Number of FOC's Received Within 48 Hours: 21

Percent of FOC's Received Within 48 Hours: 64%

Customer PON	ASR Date	FOC Date	Number of Days	Due Date
sull2dso.cr	12/31/97	01/05/98	3	01/20/98
JRDavis.B1.TA	12/31/97	01/06/98	4	01/08/98
intell.t1.cr	01/06/98	01/12/98	4	01/20/98
faro.ds0	12/30/97	01/15/98	12	01/07/98
COAST1DSO.CR	01/14/98	01/20/98	4	01/26/98
west.port1	01/20/98	01/23/98	3	01/24/98
westing.ds1	01/20/98	01/23/98	3	01/24/98
WENSOUTHDISC.CR	01/16/98	01/23/98	5	01/23/98
APEX2WNPKDSO.CR	01/20/98	01/26/98	4	01/30/98
Citrus.b1.ta	01/20/98	01/26/98	4	01/30/98
First2b1.ta	01/20/98	01/26/98	4	02/02/98
wmfeb1.ta	01/20/98	01/27/98	5	01/30/98

Number of Orders are reported to the best of our knowledge using information found in the Sprint Files. Orders include requests for services migrating from BellSouth to Sprint, new services for Sprint customers, and add'l services to existing customers.

BellSouth FOC Problems
February 1998

FOC Problems (Over 48 Hours)

(FOC=Firm Order Confirmation) **Number ASR's Submitted to have an FOC in the Current Month: 26**

(ASR=Access Service Request) **Number of FOC's Received Within 48 Hours: 23**

(PON=Purchase Order Number) **Percent of FOC's Received Within 48 Hours: 88%**

Confirmation ID	ASR Date	FOC Date		Last Date
Suntel.PRI				
	02/05/98	No FOC	-	-
citrus.bri2	02/17/98	02/20/98	3	03/05/98
N.SIGNAT.8ROT.DR	02/19/98	02/25/98	4	03/04/98

Number of Orders are reported to the best of our knowledge using information found in the Sprint Files. Orders include requests for services migrating from BellSouth to Sprint, new services for Sprint customers, and add'l services to existing customers.

BellSouth FOC Problems
March 1998

FOC Problems (Over 48 Hours)

(FOC=Firm Order Confirmation)   **Number ASR's Submitted to have an FOC in the Current Month: 46**

(ASR=Access Service Request)   **Number of FOC's Received Within 48 Hours: 35**

(PON=Purchase Order Number)   **Percent of FOC's Received Within 48 Hours: 76%**

oia.ds01	02/25/98	03/02/98	3	03/06/98
oia.ds02	02/25/98	03/02/98	3	03/06/98
oia.ds03	02/25/98	03/02/98	3	03/06/98
oia.ds04	02/25/98	03/02/98	3	03/06/98
oia.ds05	02/25/98	03/02/98	3	03/06/98
oia.ds06	02/25/98	03/02/98	3	03/06/98
N.GLATTINGB1.DR	03/03/98	03/06/98	3	03/11/98
otc.ds12	03/04/98	03/10/98	4	03/12/98
N.ISLANDONE.DR	03/13/98	03/18/98	3	03/20/98
AUTO3DISC.LH	03/17/98	03/20/98	3	03/24/98
OIA2.LH	03/25/98	03/30/98	3	04/14/98

Number of Orders are reported to the best of our knowledge using information found in the Sprint Files. Orders include requests for services migrating from BellSouth to Sprint, new services for Sprint customers, and add'l services to existing customers.

BellSouth FOC Problems
April 1998

FOC Problems (Over 48 Hours)

(FOC = Firm Order Confirmation) **Number ASR's Submitted to have an FOC in the Current Month: 23**
(ASR = Access Service Request) **Number of FOC's Received Within 48 Hours: 16**
(PON = Purchase Order Number) **Percent of FOC's Received Within 48 Hours: 70%**

PON				
finsan.dso	03/31/98	04/03/98	3	Pending
Higgins & Heath	03/31/98	04/03/98	3	Pending
fiser.portb	04/03/98	04/08/98	5	04/08/98
Pro.Disc.TA	04/07/98	04/14/98	5	04/14/98
ADVENTUREDSO.CR	4//17/98	04/22/98	3	04/27/98
REAL3DT1498.CR	04/21/98	04/24/98	3	05/04/98
704649.LH	04/29/98	No Foc	No Foc	04/29/98

Total orders included by the month FOC received (or should have been received if no FOC returned).

BellSouth FOC Problems
May 1998

FOC Problems (Over 48 Hours)

(FOC=Firm Order Confirmation) **Number ASR's Submitted to have an FOC in the Current Month: 22**
(ASR=Access Service Request) **Number of FOC's Received Within 48 Hours: 22**
(PON=Purchase Order Number) **Percent of FOC's Received Within 48 Hours: 100%**

Total orders included by the month FOC received (or should have been received if no FOC returned).

BellSouth FOC Problems
June 1998

FOC Problems (Over 48 Hours)

(FOC=Firm Order Confirmation)
(ASR=Access Service Request)
(PON=Purchase Order Number)

Number ASR's Submitted to have an FOC in the Current Month: 20
Number of FOC's Received Within 48 Hours: 9
Percent of FOC's Received Within 48 Hours: 45%

PKSQ2.CC	05/28/98	06/02/98	3	06/08/98
HOLIDAY.TA	06/18/98	06/24/98	4	06/29/98
TRNSOL.CC	05/29/98	06/03/98	3	06/05/98
TROPFORD.CR	05/28/98	06/02/98	3	06/19/98
TROPSVCBAY.CR	05/28/98	06/02/98	3	06/19/98
TROPNEWGEN.CR	05/28/98	06/02/98	3	06/19/98
TROPFORD2.CR	05/28/98	06/02/98	3	06/19/98
OIA.LH	05/27/98	06/01/98	3	06/03/98
ISL3.LH	04/28/98	06/02/98	3	06/10/98
UTILCONDISC.CR	05/26/98	06/03/98	6	06/03/98
HIGHEATH	06/24/98	06/30/98	3	06/29/98

Total orders included by the month FOC received (or should have been received if no FOC returned).

EXHIBIT MLC - 2

BELLSOUTH FACILITIES PROBLEMS
JANUARY 1998

(FOC = Firm Order Confirmation)
(ASR = Access Service Request)
(PON = Purchase Order Number)

Number of Orders installed in the Current Month: 21
Number of Facility Problems in the Current Month: 2
Percent of Facility Problems of Orders Installed in the Current Month: 10%

Customer	Customer PON	Services Ordered	ASR TO BELL	FOC Received	Number Of Business Days From ASR to FOC	Original CDDD	Actual Migration Complete	Remarks
Customer A	Intell.t1.cr	DS1	01/06/98	01/12/98	4	01/15/98	01/20/98	1/13/98 - BellSouth facility problem. Pairs going to CO X-Box not compatible. BellSouth had to redo them. Service could not be installed until 1/20/98.
								1/19/98 - BellSouth still had facility problems. Sprint's BCAC specialist contacted BellSouth and escalated order.
								1/20/98 - Order was completed.
Customer B	intellbri2.cr	DS0s-4 wire	01/14/98	01/16/98	2	01/20/98	01/23/98	1/2/98 - BellSouth required a clarification.
								1/5/98 - Sprint BCAC Specialist suped ASR.
								1/6/98 - No FOC received.
								1/14/98 - PON (intellbri4.cr) cancelled. Order reissued out of Colonial due dated 1/20/98 (intellbri2.cr).
								1/14/98 - ASR Suped.
								1/16/98 - FOC Received. BellSouth expediting order, unable to guarantee installation by 1/20/98 due to their workload.
								1/19/98 - Contacted BellSouth (Lewis) has not seen the expedite order and has the order due dated for 1/20/98. Lewis stated they (BellSouth) were having facility problems. Sprint escalated to expedite the order for 1/20/98 and to receive more detail on the facility problem.
								1/23/98 - Order completed.

BELLSOUTH FACILITIES PROBLEMS
FEBRUARY 1998

(FOC = Firm Order Confirmation)
(ASR = Access Service Request)
(PON = Purchase Order Number)

Number of Orders installed in the Current Month: 28
Number of Facility Problems in the Current Month: 1
Percent of Facility Problems of Orders Installed in the Current Month: 4%

Customer	Customer PON	Services Ordered	ASR TO BELL	FOC Received	Number Of Business Days From ASR to FOC	Original CDDD	Actual Migration Complete	Remarks
Customer A	rad24trks.cr		01/05/98	01/06/98	1	01/09/98	02/04/98	1/2/98 - BellSouth (BS) required a clarification.
								1/5/98 - Supped ASR to clarify wording and changed due date to 1/12/98.
								1/6/98 - Received FOC.
								1/7/98 - BS checking to expedite due date.
								1/8/98 - BS reported not enough facilities.
								1/9/98 - BS stated they had enough facilities to work 9 of the 15 lines - if the order was reissued as an unbundled T1.
								1/14/98 - Sprint cancelled original PON and reissued order.
								1/14/98 - Instructed by Rick LaGrange, BellSouth, not to cancel order.
								1/15/98 - BellSouth will turn up the 24 circuits over the weekend.
								1/16/98 - BellSouth sent technician to wire if of the 24 circuits ordered.
								1/19/98 - The circuits were wired wrong from the BellSouth Central Office. Sprint ordered ground start, BellSouth wired for loop start.
								1/19/98 - The 9 lines were switched from loop start to ground start.
								1/19/98 - Unable to get dialtone. BellSouth unsure of what is causing problem.
								1/20/98 - BellSouth still working on problem.
								1/21/98 - BellSouth still working on dialtone problem. BellSOuth re-engineered.
								1/30/98 Line numbers are working and ready for testing.
								2/3/98 - One line not working, BellSouth repaired the line.
								2/4/98 - Customer notified Sprint 2 of the 9 lines were not working. Line repaired. Migration completed.

BELLSOUTH FACILITIES PROBLEMS

MARCH 1998

FOC = Firm Order Confirmation

ASR = Access Service Request

PON = Purchase Order Number

Number of Orders installed in the Current Month: 30

Number of Facility Problems in the Current Month: 5

Percent of Facility Problems of Orders Installed in the Current Month: 17%

Customer	Customer PON	ASR TO BELL	FOC Received	Number Of Business Days From ASR to FOC	Original CDDD	Actual Migration Complete	Remarks
Customer A	fineexp.dso	02/09/98	02/10/98	1	02/13/98	03/03/98	2/12/98 - BellSouth (B/S) notified Sprint Metro consultant of facility problem. Estimated completion date of 3/2/98.
							During the timeframe between 2/12/98 and 2/16/98 the facility problems continued. B/S stated the cut could be completed by 3/17/98, but would try for 3/16/98. The customer was not happy with the dates, the lines were required by 2/16/98 as equipment was being delivered.
							2/16/98 - Per B/S order not in engineering.
							2/27/98 - B/S notified Sprint facilities were completed.
							3/2/98 - The 3/2/98 scheduled due date was missed. Sprint's technician was unavailable. Completed 3/3/98.
Customer B	N.SIGNAT.8ROT.DR	02/19/98	02/25/98	4	02/27/98	03/03/98	On 2/24/98 Sprint Metro's consultant contacted B/S for status on the FOC. During the conversation, B/S reported a facility problem. On 2/24/98 the FOC was returned to Sprint with a new due date (changed by B/S without the consultant's knowledge) of 3/3/98. Completed 3/3/98.
Customer C	MECHT1.JT	2/6/98	2/6/98	0	2/17/98	3/14/98	2/6/98 - ASR sent to B/S.
							2/6/98 - FOC Received. Due date scheduled for 2/18/98.
							2/17/98 - Sprint ready for cut - B/S reported facility problems - not ready for 2/18/98 cut.
Customer D	GBALDS0.JT	2/26/98	2/27/98	1	3/6/98	3/10/98	3/6/98 Sprint Consultant received call from BellSouth regarding facility problems found during the cut. Bad facilities on the 4 DS0s and the T1s. BellSouth finally got the customer cutover on 3/10/98.
Customer E	HAMPTON.GST	2/23/98	2/24/98	1	3/16/98	3/19/98	2/20/98 Sprint Consultant call BellSouth for a verbal confirmation

BELLSOUTH FACILITIES PROBLEMS
MARCH 1998

FOC = Firm Order Confirmation
ASR = Access Service Request
PON = Purchase Order Number

Number of Orders installed in the Current Month: 30
Number of Facility Problems in the Current Month: 5
Percent of Facility Problems of Orders Installed in the Current Month: 17%

Customer	Customer PON	ASR TO BELL	FOC Received	Number Of Business Days From ASR to FOC	Original CDDD	Actual Migration Complete	Remarks
	HAMPTON.LST	2/23/98	2/24/98	1	3/16/98	3/19/98	of available facilities. 2/26/98 BellSouth confirmed facilities were no
							available. 3/3/98 BellSouth estimated completed date was given to
							Sprint as 3/16/98. BellSouth did not complete work until 3/18/98.
							Sprint confirmed customer installed 3/19/98.

BELLSOUTH FACILITIES PROBLEMS

APRIL 1998

FOC = Firm Order Confirmation
ASR = Access Service Request
PON = Purchase Order Number

Number of Orders installed in the Current Month: 20
Number of Facility Problems in the Current Month: 1
Percent of Facility Problems of Orders Installed in the Current Month: 5%

Customer	Customer PON	ASR TO BELL	FOC Received	Number Of Business Days From ASR to FOC	Original CDDD	Actual Migration Complete	Remarks
Customer A	holidaygst.dso	03/24/98	03/26/98	2	04/02/98	04/14/98	4/2/98 - BellSouth notified Sprint of a facility problem.
							Due date changed to 4/9/98.
							4/9/98 - Facilities not available. Due Date changed to 4/17/98.
							4/10/98 - Facilities available - due date reset for 4/14/98.
							4/14/98 - Complete

BELLSOUTH FACILITIES PROBLEMS
MAY 1998

FOC = Firm Order Confirmation
ASR = Access Service Request
PON = Purchase Order Number

Number of Orders installed in the Current Month: 22
Number of Facility Problems in the Current Month: 1
Percent of Facility Problems of Orders Installed in the Current Month: 5%

Customer	Customer PON	ASR TO BELL	FOC Received	Number Of Business Days From ASR to FOC	Original CDDD	Actual Migration Complete	Remarks
Customer A	BISMORT1498.CR	04/28/98	05/01/98	2	04/29/98	05/22/98	5/1/98 - Sprint notified of BellSouth facility problem.
							Due date changed to 5/19/98.
							5/18/98 - Sprint notified facilities still not available.
							5/19/98 - Sprint escalated facility problem with BellSouth's
							Account Team.
							5/20/98 - Sprint Consultant called BellSouth to check on
							circuits. BellSouth stated they had not yet received the
							design. The circuit would be ready 5/22/98.
							5/22/98 - Completed

BELLSOUTH FACILITIES PROBLEMS
JUNE 1998

FOC = Firm Order Confirmation
ASR = Access Service Request
PON = Purchase Order Number

Number of Orders installed in the Current Month: 20
Number of Facility Problems in the Current Month: 6
Percent of Facility Problems of Orders Installed in the Current Month: 30%

Customer	Customer PON	ASR TO BELL	FOC Received	Number Of Business Days From ASR to FOC	Original CDDD	Actual Migration Complete	Remarks
Customer A	TRNSOL.CC	05/29/98	06/03/98	3	06/07/98	06/19/98	6/10/98 - BellSouth notfied Sprint of facility problems. 6/18/98 - BellSouth cut 10 of the customer's lines - putting them out-of-service. Sprint's technician repaired the cut lines. 6/19/98 - Order completed.
Customer B	TROPFORD.CR	05/28/98	06/02/98	3	06/07/98	06/19/98	6/10/98 - BellSouth notfied Sprint of facility problems. 6/18/98 - BellSouth cut 10 of the customer's lines - putting them out-of-service. Sprint's technician repaired the cut lines. 6/19/98 - Order completed.
Customer C	TROPSVCBAY.CR	05/28/98	06/02/98	3	06/07/98	06/19/98	6/10/98 - BellSouth notfied Sprint of facility problems. 6/18/98 - BellSouth cut 10 of the customer's lines - putting them out-of-service. Sprint's technician repaired the cut lines. 6/19/98 - Order completed.
Customer D	TROPNEWGEN.CR	05/28/98	06/02/98	3	06/07/98	06/19/98	6/10/98 - BellSouth notfied Sprint of facility problems. 6/18/98 - BellSouth cut 10 of the customer's lines - putting them out-of-service. Sprint's technician repaired the cut lines. 6/19/98 - Order completed.
Customer E	TROPFORD2.CR	05/28/98	06/02/98	3	06/07/98	06/19/98	6/10/98 - BellSouth notfied Sprint of facility problems. 6/18/98 - BellSouth cut 10 of the customer's lines - putting them out-of-service. Sprint's technician repaired the cut lines. 6/19/98 - Order completed.
Customer F	HIGHEATH	06/24/98	06/30/98	3	06/24/98	06/30/98	6/23/98 - Per BellSouth facilities were not available. Order delayed one day. 6/27/98 - Per Earl McGee, BellSouth, Cable install will be completed on 6/29/98. 6/29/98 - Order completed.

EXHIBIT MLC - 3

Unbundled Customer Installs Only
Missed Customer Desired Due Dates
1998 BellSouth and Sprint Percentages

Month of Installation	Missed CDDD	BellSouth Missed Number	BellSouth Missed Percentage	Sprint Missed Number	Sprint Missed Percentage
1998					
January	8	6	75.00%	2	25.00%
February	5	4	80.00%	1	20.00%
March	13	11	84.62%	2	15.38%
Total 1st Quarter	*26*	*21*	*80.77%*	*5*	*19.23%*
April	9	6	66.67%	3	33.33%
May	8	4	50.00%	4	50.00%
June	11	9	81.82%	2	18.18%
Total 2nd Quarter	*28*	*19*	*67.86%*	*9*	*32.14%*
Total 1998 YTD	**54**	**40**	74.07%	**14**	25.93%

Installations are defined as migrations of service from BellSouth to Sprint,
and additions of service for existing customers of Sprint.
Disconnect and Cancelled orders are not included in this calculation.

EXHIBIT MLC - 4

June 11, 1998

Mr. Steve Crowe
Customer Care Manager
Sprint Metropolitan Networks, Inc.
154 Southhall Lane
Suite 400E
Maitland, FL 32751

Dear Steve:

This letter is in response to your e-mail dated June 4, 1998, requesting an investigation regarding a service problem reported by Sprint customers on incoming calls in the Orlando, Florida Azalea Park central office area on June 1, 1998. Following are the results of BellSouth's investigation.

> The condition was not the result of an outage nor associated with trunks. The Azalea Park office had an overflow route in place for 407-206 which went to the Colonial office. It was in the Colonial office that the Local Digit Interpreter Table for incoming digits 407-206 had an incorrect attribute which caused the callers to reach a recording. BellSouth's Complex Translations records, both manual and mechanized, show last activity for the 407-206 NPA NXX to be January 7, 1998. We are not aware of any activity that would have caused this particular attribute to have been changed.

> Trouble ticket #VI000860, in reference to this particular problem, was received in the UNE center at 2:03 PM eastern time and closed at 4:14 eastern time with the trouble cleared.

This problem only affected overflow calls from the Azalea Park central office for customers with the 407-206 prefix, which is Sprint Metro.

BellSouth regrets the inconvenience this may have caused Sprint Metropolitan Networks Inc., and its end users.

Please feel free to contact me if there are questions.

Sincerely,

Fran Wilemon
Systems Designer
Sprint Account Team

D

APPENDIX D